

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

Walter Krantz,) C.A. NO.: 6:09-01623-HFF
Plaintiff,)
v.) REQUEST FOR DEFAULT JUDGMENT
KLJ, Inc. f/k/a KUA Corp., f/k/a Keller) AGAINST DEFENDANT KELLER
Industries, Inc., and Keller Industries,) INDUSTRIES, INC.
Inc.,)
Defendants)

)

TO: THE DEFENDANT KELLER INDUSTRIES:

PLEASE TAKE NOTICE that Plaintiff, by and through his undersigned attorneys, hereby moves for default judgment in accordance with Fed. R. Civ.P. 55(a)(b) as a matter of law.

The grounds for this Motion are fully set forth in the supporting Affidavit of Default filed herewith.

s/Douglas F. Patrick

Douglas F. Patrick (Fed. I.D. No. 300)
Covington, Patrick, Hagins, Stern & Lewis
Post Office Box 2343
Greenville, South Carolina 29602
864.242.9000

November 10, 2009

CERTIFICATE

This is to certify that the undersigned attorney for the Plaintiff did cause the **Motion for Default and Affidavit of Default** to be served upon the attorney for the Defendant Keller Industries, by mailing a copy of the same in an envelope addressed as shown below and depositing the same in the United States Mail, proper postage affixed thereto, on November 10, 2009.

Kurt Rozelsky, Esquire
POB 87
Greenville, South Carolina 29602
Attorney for Defendant KLI

Agents of Service for Defendant
Keller Industries:

C. T. Corporation System
1200 South Pine Island Road
Plantation, FL 33324

Prentice- Hall Corporation System, Inc.
2730 Gateway Oaks Dr. Ste. 100
Sacramento, CA 95833

COVINGTON, PATRICK, HAGINS
STERN & LEWIS

s/Douglas F. Patrick